

REMARKS

I. Formalities

Applicant thanks the Examiner for acknowledging the claim for priority under 35 U.S.C. § 119, and receipt of the certified copy of the priority document submitted on August 1, 2001.

Applicant thanks the Examiner for considering the references cited with the Information Disclosure Statement filed on August 1, 2001.

The Examiner did not, however, indicate whether the Formal Drawings filed on August 1, 2001 are accepted. Applicant respectfully requests that the Examiner acknowledge and approve the aforementioned Formal Drawings.

II. Status of the Application

Claims 1-16 are all the claims pending in the Application, with claims 1, 15, and 16 being in independent form. Claims 1, 4, 6-7, 15, and 16 have been amended only for the sake of improved conformity to U.S. practice. Claims 1-16 have been rejected.

III. Claim Rejections under 35 U.S.C. §103

As a preliminary matter, Applicant notes that the grounds of rejection are internally inconsistent. The grounds of rejection initially indicate that claims 1, 3, 12-13, and 15-16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over European Patent Application No. EP 0 748 136 A1 to Sipilä (hereinafter "Sipilä"). However, the grounds of rejection

acknowledge that Sipilä does not teach or suggest all the features of claims 1, 3, 12-13, and 15-16, and then rely on U.S. Patent No. 6,169,895 to Buhrmann *et al.* (hereinafter “Buhrmann”) in attempt to remedy the deficient teachings of Sipilä. Thus, according to the most plausible grounds of rejection, the Examiner has rejected claims 1, 3, 12-13, and 15-16 under 35 U.S.C. § 103(a) as being unpatentable over Sipilä in view of Buhrmann. Applicant respectfully traverses this rejection for *at least* the reasons stated below.

In order for the Examiner to maintain a rejection under 35 U.S.C. §103, Sipilä, Buhrmann, or some combination thereof, must teach or suggest all of the limitations of claims 1, 3, 12-13, and 15-16. Applicant respectfully submits that neither Sipilä, Buhrmann, nor any combination thereof, teaches or suggests all of the limitations of claims 1, 3, 12-13, and 15-16.

A. Independent Claim 1

Independent claim 1 requires (among other things):

a correspondence memory establishing a
correspondence between service codes of said
first network and service codes of said
second network.

The grounds of rejection allege that Sipilä teaches the feature of establishing a correspondence between service codes of a first network and service codes of a second network, as required by claim 1. Applicant respectfully disagrees with the grounds of rejection.

In contrast to the requirements of claim 1, Sipilä teaches a method for using the data services of a Global System for Mobile Communications (“GSM”) cellular telecommunications

system, from a terminal belonging to a Digital European Cordless Telecommunications (“DECT”) system. As taught in Sipilä, the term “data services” refers to various types of data transmission and communication services such as a fax service. *See* column 7, lines 25-41; Figures 5 and 6.

In particular, Sipilä teaches that it is conventionally known to connect a DECT base station directly to a GSM mobile switching center, thus making it possible to have a speech connection from a mobile telephone in a DECT system to another telephone through a GSM network. *See* column 1, lines 50-54. However, Sipilä teaches that such conventional methods have not provided the possibility of using the varied range of GSM system data communication services during such a connection. *See* column 1, lines 54-57. This is because conventional methods have not been able to implement the rate adaptations required for data communication between the GSM and the DECT systems. *See* column 1, line 57 – column 2, line 2.

Accordingly, Sipilä teaches a method for implementing the rate and protocol adaptations required for using data services provided by a GSM system from a DECT terminal. *See* column 2, lines 3-11; column 1, lines 5-10. That is, Sipilä teaches transferring data to/from a GSM system from/to a DECT system by (1) implementing a series of rate adaptations to the transferred data, and by (2) adapting the protocol of the transferred data from the DECT system protocol to the GSM system protocol.

However, Sipilä does not teach or suggest a correspondence memory establishing a correspondence between service codes of a first network and service codes of a second network,

as required by claim 1. In fact, Sipilä provides no suggestion of any service codes whatsoever, much less a suggestion of establishing a correspondence between the service codes of a first network and the service codes of a second network, as alleged in the grounds of rejection. To the contrary, at the very most, Sipilä teaches adapting the protocol of data transferred from a first system (the DECT system) to the protocol of a second system (the GSM system).

Thus, Sipilä teaches adapting data such that it is transferred according to a different protocol (i.e., the same data is transferred, but in a different protocol, or according to a different set of rules). However, Sipilä does not teach or suggest establishing a correspondence between service codes of a first network and a second network (i.e., a correspondence between different data values), as required by claim 1. Furthermore, Sipilä fails to teach or suggest a correspondence memory establishing a correspondence between service codes, as required by claim 1.

Indeed, the Examiner acknowledges that Sipilä fails to teach or suggest a memory with service codes. *See* Office Action page 3, lines 6-7. Nevertheless, the grounds of rejection apply Buhrmann, taking the position that Buhrmann teaches a memory with service codes. Moreover, the grounds of rejection allege that one of ordinary skill would have been motivated to modify Sipilä with Buhrmann for enhanced compatibility. Applicant respectfully disagrees with the grounds of rejection.

Buhrmann fails to teach or suggest a correspondence memory establishing a correspondence between service codes of a first network and service codes of a second network,

as required by claim 1. In fact, contrary to the grounds of rejection, Buhrmann does not even teach a memory with service codes. In contrast, Buhrmann teaches that the memory unit 102 stores various Calling Party Numbers. *See* column 9, lines 1-2. Specifically, Buhrmann teaches that the memory unit 102 stores the calling numbers received from a landline network when a mobile unit is not able to accept a call. *See* column 8, lines 6-9. Buhrmann also teaches that the memory unit 102 can store emergency telephone numbers. *See* column 8, lines 9-10.

However, Buhrmann provides no suggestion that the memory unit 102 stores any service codes whatsoever. Thus, Buhrmann is incapable of providing any suggestion that the memory unit 102 establishes a correspondence between service codes of a first network and service codes of a second network, as required by claim 1. Therefore, neither Sipilä, Buhrmann, nor any combination thereof, teaches or suggests a correspondence memory establishing a correspondence between service codes of a first network and service codes of a second network, as required by Applicant's claim 1.

Thus, Applicant respectfully submits that independent claim 1 is patentable over the applied references for *at least* these reasons. Further, Applicant respectfully submits that dependent claims 2-14 are allowable, *at least* by virtue of their dependency on claim 1.

Accordingly, Applicant respectfully requests that the Examiner withdraw this rejection.

B. Independent Claim 15

Independent claim 15 requires (among other things);

a memory structured to establish a
correspondence between service codes of said
first network and service codes of said
second network.

In view of the similarity between this requirement and the requirement discussed above with respect to independent claim 1, Applicant respectfully submits that the foregoing arguments as to the patentability of independent claim 1 apply at least by analogy to claim 15. As such, it is respectfully submitted that claim 15 is patentably distinguishable over the prior art of record. Accordingly, Applicant respectfully requests that the Examiner withdraw this rejection.

C. Independent Claim 16

Independent claim 16 requires (among other things);

a memory structured to establish a
correspondence between service codes of said
first network and service codes of said
second network.

In view of the similarity between this requirement and the requirement discussed above with respect to independent claim 1, Applicant respectfully submits that the foregoing arguments as to the patentability of independent claim 1 apply at least by analogy to claim 16. As such, it is respectfully submitted that claim 16 is patentably distinguishable over the prior art of record. Therefore, Applicant respectfully requests that the Examiner withdraw this rejection.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

Amendment Under 37 C.F.R. § 1.1111
U.S. Serial No. 09/918,501

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Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

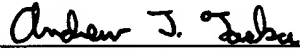
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